

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:

6/25/21

Completion date for Phase I Discovery as agreed upon by the parties:
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

7/27/21

Date for initial settlement conference:

(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)

8/17/21

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings:

(Presumptively 15 days post initial settlement conference)

8/25/21

First requests for production of documents and for interrogatories due by:

(Presumptively 15 days post joining/amending)

9/10/21

All fact discovery completed by:

(Presumptively 3.5 months post first requests for documents/interrogatories)

12/10/21

Exchange of expert reports completed by:

(Presumptively 30 days post fact discovery)

12/20/21

Expert depositions completed by:

(Presumptively 30 days post expert reports)

1/6/22

COMPLETION OF ALL DISCOVERY BY:

(Presumptively 9 months after Initial Conference)

1/6/22

Final date to take first step in dispositive motion practice:

(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)

1/27/22

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?

YES